# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

In re:	)	Chapter 11
SCOTTY'S HOLDINGS, LLC, et al., 1	)	Case No. 18-09243-JJG-11
Debtors.	)	(Jointly Administered)
	/	

## AGREED ENTRY ON APPLICATION FOR ADMINISTRATIVE PRIORITY CLAIM

This matter comes before the Court on the Application of Creditor Precedent Countryside Acquisitions, LLC ("Precedent") for Administrative Priority Claim pursuant to 11 U.S.C. §§ 365(d)(3) and 503(b)(1) filed May 31, 2019 (Doc. 389, the "Application"). In resolution of the issues raised in the Application and the Debtors' objections thereto, the Debtors and Precedent hereby agree and stipulate as follows:

- Precedent shall be allowed an administrative priority claim in the amount of \$65,000.00 against the estate of Scotty's Indianapolis, LLC (Case No. 18-09251-JJG-11).
- 2. The Debtors agree to the allowance of, and not to object to, the unsecured claims filed by Precedent jointly and severally against the estates of Scotty's Indianapolis, LLC (Case No. 18-09251-JJG-11, Claim No. 42) and Scotty's Holdings, LLC (Case No. 18-09243-JJG-11, Claim No. 12) in the amount of \$467,478.80.

<sup>&</sup>lt;sup>1</sup> The Debtors include Scotty's Holdings, LLC, Case No. 18-09243-JJG-11; A Pots & Pans Production, LLC, Case No. 18-09244-JJG-11; Scotty's Thr3e Wise Men Brewing Company, LLC, Case No. 18-09245-JJG-11; Scotty's Brewhouse, LLC, Case No. 18-09246-JJG-11; Scotty's Brewhouse Bloomington, LLC, Case No. 18-09248-JJG-11; Scotts's Brewhouse West Lafayette, LLC, Case No. 18-09250-JJG-11; Scotty's Indianapolis, LLC, Case No. 18-09251-JJG-11; Scotty's Brewhouse Downtown Indianapolis, Case No. 18-09252-JJG-11; Scotty's Brewhouse Mishawaka, LLC, Case No. 18-09253-JJG-11; Scotty's Brewhouse Fort Wayne, LLC, Case No. 18-09255-JJG-11; Scotty's Brewhouse Butler, LLC, Case No. 18-09257-JJG-11; and Scotty's Brewhouse Waco, LLC, Case No. 18-09258-JJG-11.

- 3. Precedent agrees that it will not file an objection to confirmation in Scotty's Holdings, LLC (Case No. 18-09243-JJG-11), or in any other reorganizing Debtor's case, and further agrees that it will not submit a "no" vote if solicited to vote in any such cases.
- 4. Precedent expressly reserves its right to distributions from the estate of Scotty's Indianapolis, LLC (Case No. 18-09251-JJG-11) and its right to object in that case to distributions to any other creditor or person-in-interest.

The undersigned further certify that the Application was properly served, the deadline to file objections to the Application has expired, and no timely objections to the Application have been filed. Accordingly, the parties request that the Court enter an order on the Application consistent with this agreed entry.

Respectfully submitted,

/s/ Jeffrey A. Hokanson

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## **CERTIFICATE OF SERVICE**

I hereby certify that on July 23, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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I further certify that, on July 23, 2019, I caused the foregoing to be served via first-class U.S. mail on the following addresses:

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> /s/ Jeffrey A. Hokanson Jeffrey A. Hokanson